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7 *Attorneys for Defendants Janet Chubb,  
Tiffany Schwartz, and Armstrong Teasdale, LLP*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MARC HARRIS, an individual; on behalf of  
12 himself and all others similarly situated,

13 Plaintiffs,

14 v.

15 DEAN MEILING, an individual; MADYLON  
16 MEILING, an individual; MEILING FAMILY  
PARTNERS, LTD; JAMES PROCTOR, an  
17 individual; JANET CHUBB, an individual;  
TIFFANY SCHWARTZ, an individual;  
18 CHEMEON SURFACE TECHNOLOGY LLC,  
a Nevada Limited Liability Company; DSM  
PARTNERS, LP, a Nevada Limited  
19 Partnership; DSM P GP LLC, a Nevada Limited  
Liability Company; ARMSTRONG  
20 TEASDALE LLP, a Missouri Limited Liability  
Partnership; KAEMPFER CROWELL, LTD., a  
22 Nevada Professional Corporation; MERIDIAN  
ADVANTAGE, and, unknown entity; SUITE B  
LLC., a Nevada Limited Liability Company,  
24 and DOES 1-100, inclusive,

25 Defendants.

Case No.: 3:19-cv-00339-MMD-CBC

11 **STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT  
(FIRST REQUEST)**

26 **AND ALL RELATED CLAIMS**

1        WHEREAS, on March 18, 2019, Plaintiff Marc Harris ("Plaintiff") filed a Complaint  
2 against Defendants DEAN MEILING ("Dean"), MADYLON MEILING ("Madylon"),  
3 MEILING FAMILY PARTNERS, LTD, JAMES PROCTOR, JANET CHUBB ("Chubb"),  
4 TIFFANY SCHWARTZ ("Schwartz"), CHEMEON SURFACE TECHNOLOGY LLC  
5 ("Chemeon"), DSM PARTNERS, LP ("DSM Partners"), DSM P GP LLC ("DSMP"),  
6 ARMSTRONG TEASDALE LLP ("Armstrong Teasdale"), KAEMPFER CROWELL, LTD.,  
7 MERIDIAN ADVANTAGE, and SUITE B LLC ("Suite B") in the Superior Court Orange  
8 County Case No. 30-2019-01058061.<sup>1</sup>

9        WHEREAS, on March 28, 2019, the Meiling Defendants filed a Notice of Removal with  
10 the United States District court Central District of California Southern Division. (ECF No. 1).

11        WHEREAS, on April 25, 2019, Plaintiff filed an Amended Complaint. (ECF No. 10).

12        WHEREAS, on June 19, 2019, an Order Transferring Case to United States District  
13 Court for the District of Nevada was filed. (ECF No. 33.)

14        Pursuant to Local Rule 6-1, Plaintiff and Defendants Chubb, Schwartz and Armstrong  
15 Teasdale, by and through their respective undersigned counsel, hereby stipulate and agree that  
16 Defendants Chubb, Schwartz and Armstrong Teasdale shall have up to and including July 18,  
17 2019, to respond to Plaintiff's Amended Complaint. (ECF No. 10).

18        An extension is necessary to allow Defendants Chubb, Schwartz and Armstrong  
19 Teasdale time to formalize their joint representation with Nevada counsel and to provide their  
20 counsel adequate time to investigate and evaluate the allegations contained in the Amended  
21 Complaint.

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<sup>1</sup> Defendants Dean, Madylon, Chemeon, DSM Partners, DSMP, and Suite B shall be collectively  
27 referred to as "**Meiling Defendants**".

1        This is the first request by Defendants Chubb, Schwartz and Armstrong Teasdale for an  
2 extension of time to respond to the Amended Complaint. This request is made in good faith and  
3 is not for the purpose of causing undue delay.

4        DATED this 2nd day of July, 2019.

5 **K&L LAW GROUP**

6 /s/ Marc Y. Lazo

7 MARC Y. LAZO, ESQ.  
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10      *Attorneys for Plaintiff/Counterdefendant*  
11      *Marc Harris*

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6 /s/ Oliver J. Pancheri

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12      *Attorneys for Defendants Janet Chubb, Tiffany*  
13      *Schwartz, and Armstrong Teasdale LLP*

15      IT IS SO ORDERED.

16        
17      UNITED STATES MAGISTRATE JUDGE

18      Dated: 7/02/2019

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on July 2, 2019, I caused a true and correct copy of the  
3 **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT (FIRST**  
4 **REQUEST)** to be filed with the Clerk of the Court using the Court's CM/ECF system, and  
5 service was thereby effected electronically to the following counsel:

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13                  Harris*

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22                  *Attorneys for Defendants/Counterclaimants*  
23                  *Dean Meiling, Madylon Meiling, Chemeon*  
24                  *Surface Technology LLC, DSM Partners, LP,*  
25                  *DSM P GP LLC, Suite B LLC*

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